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14 Attorneys for Plaintiff,

15 VANESSA LEAVITT

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 VANESSA LEAVITT, an individual

19 Plaintiff,

20 vs.

21 WHITE PINE COUNTY, a political
22 subdivision of the State of Nevada;
23 WHITE PINE COUNTY SHERIFF'S
24 OFFICE, a political subdivision of
25 the State of Nevada; RICK ASHBY,
26 an individual; ANTHONY SIFRE,
27 an individual; MELVIN LACKEY,
28 an individual; and Does 1-25,

Defendants.

Case No.: 3:24-cv-0 0445-MMD-CLB

**STIPULATION AND PROPOSED ORDER
TO EXTEND TIME TO FILE
STIPULATION OF DISMISSAL
(First Request)**

1 Pursuant to Local Rules LR IA 6-1, 6-2, and 7-1, Plaintiff VANESSA
2 LEAVITT ("PLAINTIFF" or "Ms. LEAVITT"); Defendants RICK ASHBY ("Mr.
3 ASHBY"), ANTHONY SIFRE ("Mr. SIFRE"), and MELVIN LACKEY ("Mr.
4 LACKEY") (together, the "Individual Defendants"); and Defendant WHITE
5 PINE COUNTY (the "COUNTY") (collectively, the "Parties"), through their
6 counsel of record, hereby stipulate to amend this Court's February 26, 2025
7 Minute Order (ECF # 44) (the "Minute Order") requiring the filing of a
8 stipulation for dismissal of the Individual Defendants on or before March 12,
9 2025. This first requested extension is sought in good faith and not for the
10 purposes of delay.

11 The Parties are forced to request this extension because, despite their
12 collective good-faith efforts to comply with the Minute Order, counsel for Mr.
13 ASHBY and Mr. LACKEY have been unable to deliver their settlement
14 payments to PLAINTIFF as specified in the underlying Order regarding
15 settlement issued by Judge Denney after the Early Neutral Evaluation (ECF #
16 36) (the "Settlement Order") held on February 18, 2025. Specifically, the
17 settlement checks originally mailed by counsel for Mr. ASHBY and Mr.
18 LACKEY on February 18, 2025 through the United States Postal Service
19 ("USPS") have not yet been delivered and appear to have been lost or
20 damaged in transit. However, shortly before the filing of the instant
21 stipulation, counsel for Mr. ASHBY and Mr. LACKEY forwarded a United
22 Parcel Service, Inc. ("UPS") tracking number confirming that new settlement
23 checks for Mr. ASHBY and Mr. LACKEY have been reissued and were resent
24 to counsel for PLAINTIFF today, March 12, 2025. In addition, while
25 PLAINTIFF has received and deposited Mr. SIFRE's settlement check, those
26 funds are not expected to clear until March 13, 2025.

1 Accordingly, the Parties respectfully request that the Court extend
2 their deadline to file a Stipulation for dismissal of the Individual Defendants
3 by seven (7) days, until **March 19, 2025**.

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9 DATED: March 12, 2025

Respectfully submitted,

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11 By /s/ Ranojoy Guha

12 Ranojoy Guha

13 **THE GUHA LAW FIRM**

14 Jonathan A. Weinman

15 **LAW OFFICES OF JONATHAN A.**

16 **WEINMAN, APC**

17 *Attorneys for Plaintiff VANESSA LEAVITT*

18
19 By /s/ Rebecca Bruch

20 REBECCA BRUCH, ESQ.

21 **LEMONS, GRUNDY & EISENBERG**

22 *Attorneys for Defendant ANTHONY SIFRE*

23 By /s/ Tabetha J. Steinberg

24 TABETHA J. STEINBERG, ESQ.

25 **MARQUIS AURBACH**

26 *Attorneys for Defendant RICK ASHBY and*
27 *MELVIN LACKEY*

1 **IT IS SO ORDERED:**
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4 DATED: March 13, 2025
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UNITED STATES DISTRICT JUDGE
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